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March 13, 1998

BY FACSIMILE

Nancy E. Bell, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4594

Dear Ms. Bell:

This letter is in response to your letter to me of March 10, 1998, regarding documents numbered 000039-000042, which CAL produced in response to the subpoena issued by the Commission on October 17, 1997. As an initial matter, we assume that your translator is from mainland China, and note therefore that the first translation of each employee's name does not reflect the spellings that the employees themselves use. Those spellings are indicated in your translation in parentheses.

The classifications you have asked about, "Code Number," "Salary Grade," "Personnel Change Code," and "New Position," reflect numeric codes for data processing purposes. According to China Airlines, the "Code Number" listed for each employee is simply an employee identification number. Code numbers listed under "Salary Grade" reflect the employees' grade and level. For instance, on Document No. 000039, the notice of personnel change relating to Mr. Chun-I Hsu, his salary grade was 11, level 14, and therefore the code number was 1114 (Grade 11 and Level 14). The code numbers describing positions referred to the location of the position and general level within the company. For instance, again with regard to Mr. Chun-I Hsu, code number 756 referred to Hawaii and code number 034C indicated a management level position. Therefore code number 756034C meant a management level position in Hawaii. Code number 710 (and, later 150) referred to San Francisco. Therefore the code number for his previous position, 710034C, referred to a management level position in San Francisco. Some of the notices of personnel change included a "Personnel Change Code." This was a general indication of the type of employee move involved; that is, it was a general categorization indicating whether the move was within the company headquarters, to another

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city, or to another company. Finally, some of the notices include remarks concerning salary and the storage place for employee records.

CAL fully complied with the Commission's subpoena and is unaware of responsive documents other than those it has previously produced.

Sincerely,



Margaret Ackerley

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